

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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	:	
THE UNITED STATES OF AMERICA	:	
<i>ex rel.</i> (UNDER SEAL),	:	
	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	
	:	
(UNDER SEAL)	:	
	:	
Defendants.	:	
-----	X	

FILED *IN CAMERA* AND UNDER SEAL  
PURSUANT TO 31 U.S.C. § 3730(b)(2)

DO NOT ENTER IN ECF/PACER

DO NOT PUT IN PRESS BOX

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

	X	
THE UNITED STATES OF AMERICA	:	
<i>ex rel.</i> JOHN DOE	:	
	:	Civil Action No.
<b>Plaintiff,</b>	:	
	:	
v.	:	FILED
	:	IN CAMERA AND
RANBAXY LABORATORIES LIMITED, <i>et al.</i> ,	:	UNDER SEAL
	:	31 U.S.C. § 3730(b)(2)
<b>Defendants.</b>	:	
	:	DO NOT ENTER IN
	:	ECF/PACER
	:	
	:	DO NOT PLACE IN
	:	PRESS BOX
	X	

**NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE* OF ANDREW M. BEATO, ESQ., JED WULFEKOTTE, ESQ., AND MERYL D. GRENADIER, ESQ.**

PLEASE TAKE NOTICE that pursuant to Local Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey, Plaintiff-Relator John Doe (“Plaintiff”) will move this Court on July 18, 2016, for the admission *pro hac vice* of Andrew M. Beato, Esquire; Jed Wulfekotte, Esquire; and Meryl D. Grenadier, Esquire.<sup>1</sup>

In support of this Motion, Plaintiff submits Certifications by Jae Y. Kim, Esquire; Andrew M. Beato, Esquire; Jed Wulfekotte, Esquire; and Meryl D. Grenadier, Esquire. *See* Attachments A-D.

On June 21, 2016, the United States Attorney's Office for the District of New Jersey advised counsel to Plaintiff-Relator that it consents to the *pro hac vice* admission of Andrew M. Beato, Esquire; Jed Wulfekotte, Esquire; and Meryl D. Grenadier, Esquire.

<sup>1</sup> The above captioned matter is filed *in camera* and under seal pursuant to 31 U.S.C. § 3730(b)(2).

A proposed Order is attached hereto.

Respectfully submitted,

s/ Andrew M. Beato

Andrew M. Beato (DC Bar No. 469097)

*Pro Hac Vice Application Pending*

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s/ Jae Y. Kim

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***Counsel for Relator***

June 23, 2016

**STATEMENT IN LIEU OF BRIEF PURSUANT TO LOCAL CIVIL RULE 7.1(d)(4)**

Pursuant to L. Civ. R. 7.1(d)(4), Plaintiff submits this statement in lieu of a submission of a formal brief. It is respectfully submitted that no brief in support of this motion is necessary because admissions under L. Civ. R. 101.1(c) is a matter within the sound discretion of the Court.

s/ Jae Y. Kim  
Jae Y. Kim, Esq.

June 23, 2016

**CERTIFICATE OF SERVICE**

I certify that on this 23rd day of June, 2016, a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice*, was filed under seal with the Clerk of Court and was served on all parties listed below in accordance with the Federal Rules of Civil Procedure:

The Honorable Loretta E. Lynch  
United States Attorney General  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001

Paul J. Fishman, Esq.  
United States Attorney, District of New Jersey  
Jacob T. Elberg, Esq.  
Chief, Health Care and Government Fraud Unit  
Jane H. Yoon, Esq.  
Assistant United States Attorney  
U.S. Attorney's Office  
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s/ Jae Y. Kim  
Jae Y. Kim, Esq.